

WEST OXFORDSHIRE DISTRICT COUNCIL
ECONOMIC AND SOCIAL OVERVIEW AND SCRUTINY COMMITTEE
THURSDAY 14 SEPTEMBER 2017
RESPONSE TO CHERWELL LOCAL PLAN PARTIAL REVIEW
REPORT OF THE HEAD OF PLANNING AND STRATEGIC HOUSING
(Contact: Giles Hughes, Tel: (01993) 861000)

(The Committee's decisions on this matter will be recommendations to the Cabinet)

I. PURPOSE

To consider the Council's response to Cherwell District Council's consultation on the proposed submission plan for their partial review of the Cherwell Local Plan to address Oxford's unmet housing need.

RECOMMENDATION: that the Committee recommends that the Cabinet:-

- (a) welcomes the positive steps being taken by Cherwell District Council to review their Local Plan in order to address the issue of Oxford City's unmet housing need.
- (b) approves the attached representation (Appendix 3) as the Council's response to Cherwell District Council's consultation, subject to any amendments that Members wish to make.

2. BACKGROUND

- 2.1. On 17th July 2017 Cherwell District Council published their proposed submission plan for their partial review of the Cherwell Local Plan (Part 1) dealing with the issue of Oxford City's unmet housing need. The consultation closes on the 10th October 2017.
- 2.2. In 2014 the Oxfordshire Strategic Housing Market Assessment (SHMA) identified an objectively assessed range of housing need for Oxford of between 24,000-32,000 homes for the period 2011-2031. It is clear that Oxford is not able to meet all of its housing need within its own boundaries.
- 2.3. The Localism Act 2011 places a Duty to Co-operate on Local Planning Authorities (LPAs). This requires them to engage constructively, actively and on an on-going basis in the preparation of development plan documents where this involves strategic matters. Assisting Oxford with its unmet housing need is a key element of the Duty to Co-operate in Oxfordshire.
- 2.4. The Cherwell Local Plan was adopted on the 20th July 2015 and contains a commitment to partially review the plan within two years of adoption, if joint working demonstrates that Cherwell District needs to play a role in helping meet Oxford City's unmet housing need. The proposed submission plan meets this commitment.
- 2.5. The Oxfordshire Growth Board process to apportion the unmet housing need from Oxford City concluded in September 2016. This followed an extensive technical work programme involving officers from the four District Councils, Oxford City Council, and Oxfordshire County Council. This work programme evaluated a range of strategic options available to help meet Oxford City's unmet need. A figure of 4,400 dwellings was identified for Cherwell and this was based upon a positive technical evaluation of strategic options on land north of Oxford, an area at Begbroke, and on land south-east of Kidlington. In accordance with their agreed apportionment, the proposed submission plan

contains a package of proposed housing allocations to deliver 4,400 additional homes by 2031.

- 2.6. Cherwell District Council carried out two earlier public consultations which have informed their proposed submission plan. In January 2016, an initial 'Issues' consultation paper was published highlighting issues that needed to be considered in undertaking a partial review of the Cherwell Local Plan. In November 2016 Cherwell published an 'Options Paper' for consultation on developing options on how to meet Oxford's unmet housing needs. West Oxfordshire District Council responded to the second consultation welcoming the positive steps being taken by Cherwell District Council to amend their Local Plan in order to address the issue of Oxford City's unmet housing need, and raising concerns over the potential options for urban extensions to the east of Woodstock and on the transport impact on the A44.

Vision and Spatial Strategy

- 2.7. The proposed submission plan sets out the following vision for meeting Oxford's unmet housing needs in Cherwell:

"To provide new development that meets Oxford's agreed, identified housing needs, supports the city's world-class economy, universities and its local employment base, and ensures that people have convenient, affordable and sustainable travel opportunities to the city's places of work, study and recreation, and to its services and facilities. This development will be provided so that it:

- i. creates balanced and sustainable communities*
- ii. is well connected to Oxford*
- iii. is of exemplar design which responds distinctively and sensitively to the local built, historic and environmental context*
- iv. is supported by necessary infrastructure*
- iv. provides for a range of household types and incomes reflecting Oxford's diverse needs*
- v. contributes to improving health and well-being, and*
- vi. seeks to conserve and enhance the natural environment."*

- 2.8. In order to support the vision and set a context for the submission plan's policies the following strategic objectives relevant to meeting Oxford's unmet housing needs have been identified:

Strategic Objective SO16

To work with Oxford City Council and Oxfordshire County Council, and other neighbouring authorities as required, in delivering Cherwell's contribution to meeting Oxford's unmet housing needs with its required infrastructure by 2031.

Strategic Objective SO17

To provide Cherwell's contribution to meeting Oxford's unmet housing needs so that it supports the projected economic growth which underpins the agreed Oxfordshire Strategic Housing Market Assessment 2014 and the local economies of Oxford and Cherwell.

Strategic Objective SO18

To provide housing for Oxford so that it substantively provides affordable access to new homes for those requiring 'affordable' housing, new entrants to the housing market, key workers and

those requiring access to Oxford's key employment areas, and to provide well-designed development that responds to both needs and the local context.

Strategic Objective SO19

To provide Cherwell's contribution to meeting Oxford's unmet housing needs in such a way that it complements the County Council's Local Transport Plan, including where applicable, its Oxford Transport Strategy and so that it facilitates demonstrable and deliverable improvements to the availability of sustainable transport for access to Oxford.”

2.9. The following strategic development sites are proposed:

Area	Policy/ Site	No. Of Homes
North Oxford	Policy PR6a - Land East of Oxford Road	650
	Policy PR6b - Land West of Oxford Road	530
	Policy PR6c - Land at Frieze Farm (reserved site - for replacement Golf Course)	-
Kidlington	Policy PR7a - Land South East of Kidlington	230
	Policy PR7b - Land at Stratfield Farm	100
Begbroke	Policy PR8 - Land East of the A44	1950
Yarnton	Policy PR9 - Land West of Yarnton	530
Woodstock	Policy PR10 - Land South East of Woodstock	410
Total		4,400

2.10. These sites are shown on the key diagram included in Appendix I.

Green Belt

2.11. Six of the seven proposed strategic development sites for housing currently fall within the Oxford Green Belt (sites in North Oxford, Kidlington, Begbroke and Yarnton). The proposed submission plan proposes to remove these sites from the Green Belt, along with a number of other sites for transport infrastructure or longer term safeguarding. Cherwell District Council has undertaken a Green Belt review to assess the contribution of these sites to the Oxford Green Belt. Cherwell conclude that exceptional circumstances exist to justify the development of sites in the current Green Belt. This includes the need to help meet Oxford City’s unmet housing need in a sustainable manner.

Transport Infrastructure

2.12. The proposed submission plan seeks to locate growth close to Oxford to minimise the impact of vehicle trips on the road network. It focuses on improving non-car travel options, safety of movement and improved journey times for existing residents, key employment locations and new residents.

2.13. Cherwell consider that the development sites that they have identified relate well to the main roads leading into Oxford the A44 and the A4165 and existing bus routes serving the city centre. They are also considered to relate well to the Oxford Parkway Railway Station and existing Water Eaton and Peartree Park and Ride facilities, and will provide the opportunity to build upon the current high level of use of sustainable transport. 20-25% of trips to work are presently made on foot or by cycle in areas near Oxford with a similar percentage using public transport for daily commuting.

2.14. The following transport schemes are included in the proposed submission plan:

- improved bus services and facilities along:
 - i. the A44/A4144 corridor linking Woodstock and Oxford
 - ii. the A4260/A4165 (Oxford Road) linking Kidlington, Gosford, Water Eaton and Oxford
 - iii. Langford Lane
- the enhancement of the off-carriageway Cycle Track/ Shared Use Path along the western side of the A44 and the provision of at least one pedestrian and cycle and wheelchair crossing over the A44
- the prioritisation of the A44 over the A4260 as the primary north-south through route for private motor vehicles into and out of Oxford
- improved rapid transit/bus services and associated Super Cycleway along the A4260 into Oxford
- improvements to the public realm through the centre of Kidlington
- the provision of new and enhanced pedestrian, cycling and wheelchair routes into and out of Oxford.

2.15. The proposed submission plan also states that Cherwell will work cooperatively with other partners to deliver improvements to the strategic highway network, including the proposed A40-A44 link.

Green Infrastructure

2.16. The proposed submission plan makes it clear that strategic developments will be expected to protect and enhance green infrastructure and incorporate green assets and the water environment into their design approaches.

Housing Supply

2.17. Cherwell propose to monitor and manage the housing supply for Oxford's unmet housing needs separately from that required to meet Cherwell's own needs. This is a similar approach to that being taken by West Oxfordshire District Council in its emerging draft Local Plan, albeit that Cherwell take this approach a step further by proposing a separate 5 year housing supply calculation for Oxford's needs. A date of 2021 has been assumed for the completion of the first houses that will contribute towards Oxford's unmet needs. The suggested housing trajectory sees 1,810 homes completed in the years 2021 to 2026, and 2,590 homes completed in the years 2026 to 2031.

2.18. The strategic development sites proposed will vary significantly in terms of average densities as shown in the Table below:

Area	Policy/ Site	Average Density (dwellings per hectare)
North Oxford	Policy PR6a - Land East of Oxford Road	40
	Policy PR6b - Land West of Oxford Road	25
	Policy PR6c - Land at Frieze Farm (reserved	-

	site - for replacement Golf Course)	
Kidlington	Policy PR7a - Land South East of Kidlington	35
	Policy PR7b - Land at Stratfield Farm	25
Begbroke	Policy PR8 - Land East of the A44	45
Yarnton	Policy PR9 - Land West of Yarnton	35
Woodstock	Policy PR10 - Land South East of Woodstock	30

- 2.19. Some of the proposed densities appear relatively low given the location of the sites close to Oxford and close to sustainable transport options. In addition to the relatively modest net densities quoted above, the gross densities achieved on the sites above are exceptionally low. In total only 4,400 homes are planned on 463.5 hectares, a gross density of 9.5 dwellings per hectare. A further site of 7.8 hectares, Policy PR3a, is to be taken out of the Green Belt and reserved for future development beyond the plan period.
- 2.20. 50% of the homes will be affordable housing. The proposed submission plan prescribes the mix of housing sizes needed for the defined 'affordable' element of the new housing supply based on the affordable housing requirements for the Housing Market Area as specified in the SHMA. There will be a high level of affordable rent/social rented accommodation (80% of the total affordable housing requirement).
- 2.21. The proposed submission plan states that the allocation of affordable housing to those in need is a matter of housing policy rather than planning policy. Allocations will be made in accordance with an approach to be agreed between Cherwell District and Oxford City Councils. The provision of both affordable and market housing is expected to include specific provision for key workers.

Woodstock

- 2.22. The proposed submission plan proposes an urban extension to Woodstock within 52 hectares of land to the south and east of the town. This is shown on the Inset Policies Map PR10 in Appendix 2 of this report.
- 2.23. The proposed urban extension would provide 410 homes to contribute towards Oxford City's unmet housing need. The proposal includes provision for school facilities, provision of a community facility, as well as formal sports, play areas and allotments. A community woodland, retention of some land in agricultural use, and a nature conservation area are also proposed.
- 2.24. The proposed submission plan states that there is further potential for development in this location outside but next to the Oxford Green Belt. The reasons given are:
- the relationship of Woodstock to the A44 corridor
 - the sustainability of Woodstock in terms of it being a well-served, small town and the potential for integration with West Oxfordshire's extended built-up area
 - the proposals in the Oxford Transport Strategy and the A44/A4260 Corridor Study for sustainable transport improvements and traffic management measures along the corridor facilitating improved access to Oxford and providing the opportunity for a modal shift in the proportion of people accessing the city by means other than the private car

- the provision of a Park and Ride facility for Oxford next to Woodstock and improvements to the cycleway to Oxford alongside the A44
 - the immediate access to the A44 corridor from the south-eastern edge of Woodstock
 - the compatibility of the location with Cherwell's vision and objectives
 - the need to ensure that sustainable options for accommodating the required growth for Oxford within Cherwell outside the Green Belt are utilised to minimise any need to provide development within the Green Belt.
- 2.25. The proposed submission plan recognises that Woodstock is already growing through West Oxfordshire's own plans and decisions. It also refers to considerations associated with Blenheim Palace's 'Outstanding Universal Value', the protection of its registered park and their associated settings are of very high significance; and that the heritage issues associated with the Blenheim Villa Scheduled Monument to the north of the A44 must be given full regard. Cherwell are also mindful that they have previously refused planning permission for the development of approximately 1,000 homes in this area.
- 2.26. Nevertheless, Cherwell consider that a sensitively planned and designed development of limited scale can be achieved that relates well to Woodstock, delivers required facilities and responds positively to the historic environment and results in significant improvements to the natural environment to deliver a net increase in biodiversity.
- 2.27. It is not clear that Cherwell have appropriately considered the cumulative impact of the proposed urban extension in combination with the proposals in the proposed West Oxfordshire Local Plan 2031. The proposed West Oxfordshire Local Plan proposes 670 new homes on three urban extensions to Woodstock, including 300 homes to the immediate west of the Cherwell site which now have a resolution to grant planning approval subject to a Section 106 agreement. The cumulative effects that need to be considered include the impact on the setting of the Blenheim Palace World Heritage Site. The site at present is a large open field, whose openness is readily apparent from the A44 as visitors travel towards Woodstock from the South, and this contributes to the setting of the World Heritage Site. A key issue to consider is the harm that the Cherwell proposal might cause in combination with the adjoining development in West Oxfordshire.
- 2.28. Another important issue is the impact of the proposal on the setting of the Blenheim Villa Scheduled Monument which is within the site itself. Although the SAM itself will be protected from residential development, the proposed housing area would represent a significant change to the landscape just to the north of the SAM thereby adversely affecting its setting.
- 2.29. There is a strong hedgerow feature on the western boundary of the site, which follows the alignment of a historic track. The proposed urban extension would breach this natural boundary and extend development in an incongruous 'finger' to the east. As such it would not relate well to the existing urban form of Woodstock in this area.

Next Steps

- 2.30. Following consultation on the proposed submission plan, it will be submitted to the Secretary of State for independent examination by a Planning Inspector together with representations received and relevant supporting background evidence and information. The examination will then consider whether the plan is legally compliant and 'sound' (positively prepared, justified, effective and consistent with national policy). The

submission of representations at this point means that West Oxfordshire District Council will have the opportunity to participate in any examination hearing sessions that subsequently take place.

3. ALTERNATIVES/OPTIONS

- 3.1. Cabinet can choose whether it wishes to respond to Cherwell District Council's Local Plan consultation.
- 3.2. The unmet housing need of Oxford City is a major strategic planning issue for Oxfordshire. It is essential that all Oxfordshire local planning authorities take forward the apportionment for their areas. Given the proximity of the proposed allocations to West Oxfordshire the cross boundary implications need to be considered.
- 3.3. The proposed allocation at Woodstock, in Cherwell but adjoining the West Oxfordshire boundary, raises some significant issues.

4. SUGGESTED RESPONSE

- 4.1. Included in Appendix 3 is a draft response to Cherwell's consultation.
- 4.2. The draft consultation response makes the following key points:
 - Support for Cherwell District Council's positive steps in taking forward a Local Plan review to help address Oxford City's unmet housing need.
 - It is important to consider the relationship of sites with Oxford and consider how well they contribute to helping meet Oxford's needs.
 - Transport and infrastructure are key issues and growth in Cherwell needs to be looked at cumulatively with growth in West Oxfordshire.
 - Support for the release of sites from the Green Belt to help meet Oxford City's unmet housing needs.
 - Concern over the impact of the proposed Woodstock urban extension, including the potential adverse effects on the settings of important heritage assets.
 - The need to make efficient use of land released from the Green Belt for housing purposes, the proposed densities on sites released from the Green Belt do not appear to make efficient use of this land despite their close proximity to Oxford and to sustainable transport infrastructure and services.
 - More efficient use of the Green Belt sites could deliver at least 410 additional homes and therefore eliminate the need for the proposed Woodstock urban extension.

5. FINANCIAL IMPLICATIONS

- 5.1. There are no direct financial implications from responding to this consultation.

6. RISKS

- 6.1. There is a reputational risk to the Council if it does not respond constructively to the consultation. Otherwise there are no other direct risks in responding to the consultation.

7. REASONS

- 7.1. Providing comments on Cherwell District Council's Local Plan can support the Council's ability to protect and enhance the environment of West Oxfordshire and maintain the district as a clean, beautiful place with low levels of crime and nuisance. It will also support the Council's ability to work in partnership to sustain economically prosperous towns and villages with full employment.

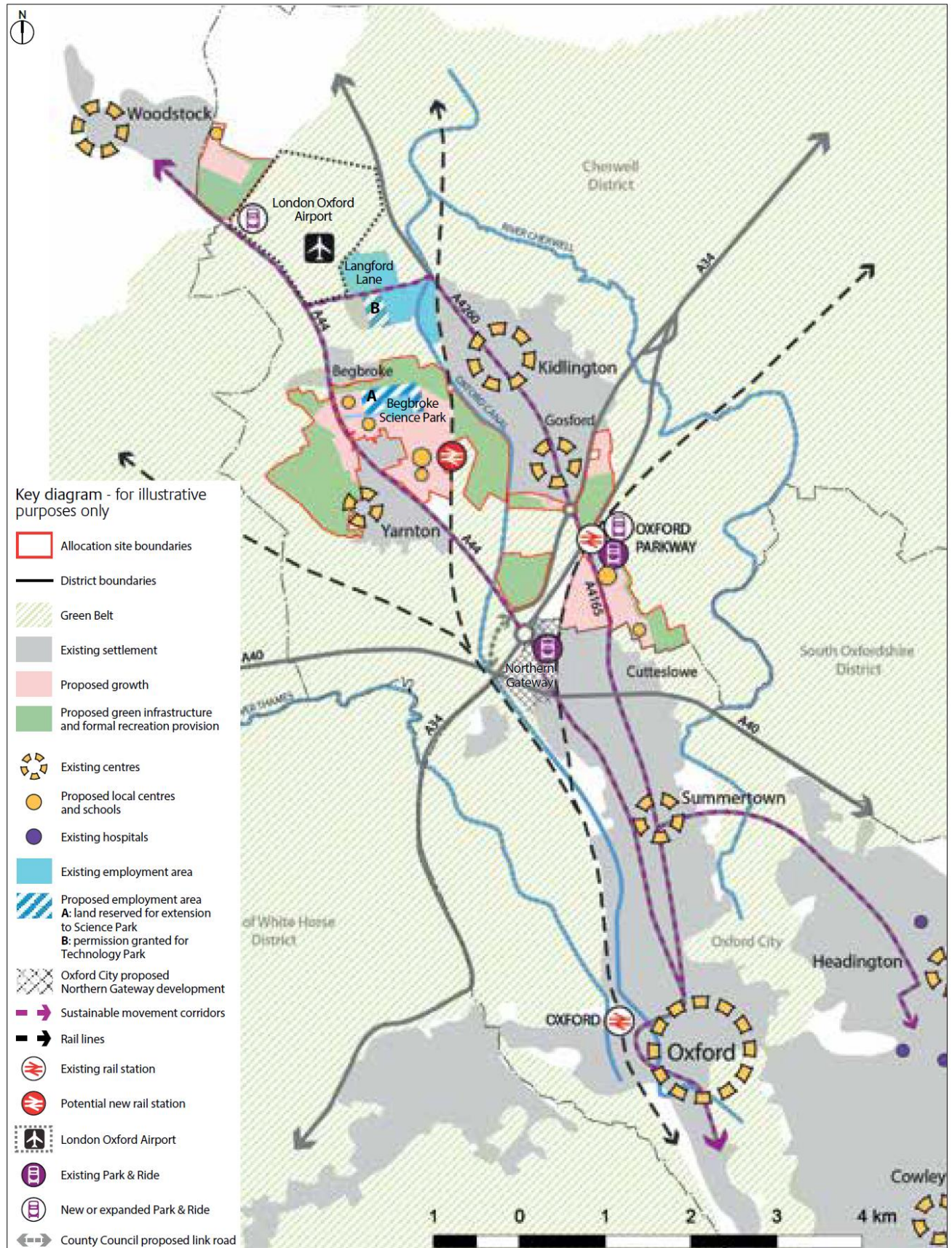
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Background Papers:

1. Cherwell Local Plan 2011-2031 (Part 1): Partial Review Proposed Submission Plan
<http://www.cherwell.gov.uk/index.cfm?articleid=9367>
2. Oxfordshire Strategic Housing Market Assessment, GL Hearn, April 2014
<https://www.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/communityandliving/ourworkwithcommunities/oxfordshirepartnership/spatialplanninginfrastructure/Final%20SHMA%20Report.pdf>
3. Memorandum of Co-operation between the local authorities in the Oxfordshire Housing Market Area, Oxfordshire Growth Board, September 2016
<https://www.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/communityandliving/partnerships/GrowthBoard/MemorandumofCooperartion.pdf>

Figure 2: Key Diagram - The Strategy Illustrated



Policy PR10 – Land South East of Woodstock

